*FORM X.B. DESCRIPTION OF MANAGEMENT AND ORGANIZATIONAL **STRUCTURE**

1. Describe the proposed management structure, organizational structure and operations for the Applicant (including an organizational chart). Emphasis should be given to the proposed method for translating local needs into corporate decisions throughout the franchise term. Include a description of the proposed relationship between local management and the head office or parent company, if applicable.

Comcast is a decentralized organization. Decisions are made on a local level by local staff. The Area Vice President and General Manager has final authority for the Reston System. He reports to the Senior Vice President of the Region who reports to the President of the Division. The President of the Division reports into Comcast Cable Communications. The Region, Division, and Corporate offices provide guidance and support to the local operations.

The Area VP/GM's immediate reports are based in facilities in Prince William County. The accompanying organizational chart details the functional roles. The primary purpose of the Reston office is to house our technical support team headed by Reggie Johnson, Technical Supervisor; this organizational chart identifies Reston-specific positions as well as additional support staff from the Prince William operation that can be drawn upon as needed.

2. Identify the supervisory personnel who will be responsible for maintaining the system and describe their technical qualifications. State whether the company will maintain the system itself or through a subcontractor. If the company, in whole or in part, will maintain the system, describe the minimum qualifications for each position involved in the maintenance of the system. If a subcontractor will maintain the system, in whole or in part, name the subcontractor, and describe its role and its qualifications.

Reggie Johnson is the Technical Supervisor responsible for maintaining the Reston, Virginia system, since 1998. In this role, he has had responsibility for the maintenance of the Reston plant and headend. He began his career in 1989 as a cable television installer. He quickly progressed to Service Technician, and then accepted the position of Safety Officer, responsible for vehicle and equipment safety inspections, and safety training. His most significant responsibilities as related to this question are as a Preventive Maintenance Tech, responsible for the Reston plant and headend; and as Technical Supervisor, responsible for the overall performance and operation of the Reston system. He is knowledgeable in both coaxial (radio frequency or RF) and fiber optic technologies.

The Memorandum on Legal Issues submitted as part of the Proposal sets forth the legal principles governing Comcast's response to this Form.

The day-to-day maintenance of the system is performed in-house. We utilize contractors to perform segments of the work required to maintain the plant over the long term.

The following are certified Comcast contracting firms. All contractors are required to be knowledgeable and experienced in the tasks they perform.

Contractor Function

Supply Performance Testers Power supply maintenance

Stevens Construction New build / cable replacement

KCS Communications Installation

RCH Communications Disconnects / Audit

Doddridge Cable Aerial plant maintenance and repair

JY Utilities Drop replacement and installation

3. Describe the training for all categories of employees, contractors and subcontractors associated with the construction, operation or maintenance of the cable system. The answer should describe: (a) what training is given, and what materials are used for the training; (b) whether the training is certified by an independent body, and if so, by whom; and (c) how the Applicant assures its contractors and subcontractors are well-trained. Applicant should also provide a description of the jobs contractors and subcontractors are hired to perform, or are expected to perform during or as part of any construction/rebuild of the system.

As we have noted previously, the Reston system was upgraded in 1999. We have no current plans to upgrade the system as the current system meets or exceeds the requirements of this RFRP. Our employees perform routine installation and maintenance.

The Technical Department has a highly structured internal training program. This is supplemented by training courses provided by NCTI and the Society of Cable Telecommunications Engineers (SCTE). Technicians only perform work for which they have been certified.

A Technician begins at CommTech 1 and builds on her skills. The tech must progress sequentially through the courses to master each of the components to receive certification.

CommTech 1 Training - This module covers the fundamentals of coaxial cable, including its components, properties, types, and handling guidelines.

CommTech 2 Training - This series of modules addresses the fundamental skills associated with different types of cable installations.

Comm Tech 3 Training - This module covers the fundamentals of cable theory, return path troubleshooting, installation, wall fish, high-definition TV, and multiple dwelling unit installation.

Comm Tech 4 Training - This module covers cable theory and terms, construction practices, troubleshooting to the node/return, track and repair, power supply maintenance, and forward and reverse alignment.

Comm Tech 5 Training - This module covers HFC architecture, fiber optics and network operations.

Materials used in the above training and any supplemental training are a combination of video, text, web based, and hands on training.

Both the NSCTI and SCTE training provide independent certification. Additionally, we have vendor based training which is also independently certified.

The following is a list of Contractors used in the Reston system:

Contractor Function

Stevens Construction New build / cable replacement

KCS Communications Installation

Doddridge Cable Aerial plant maintenance and repair

JY Utilities Drop replacement and installation